

Exhibit B

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 7
Case No. 19-12819 (CGM)

DECLARATION

Nicholas J. Sands,

Debtor.

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I, Nicholas J. Sands declare under penalty of perjury that:

1. I am the debtor in the above captioned chapter 7 case.
2. I submit this declaration in support of my motion to convert this case to a case under Chapter 11.
3. I initially filed my case pro se as a chapter 13 on September 3, 2019.
4. My case was converted to a chapter 7 on February 10, 2020 due to my failure to provide tax returns and to retain an attorney.
5. While I now know that my tax returns should have been filed prior to the filing of my bankruptcy petition, I initially delayed filing the returns as I had large carry forward losses that would have eliminated any tax liabilities that may have been owed.
6. I have now filed my tax returns and have engaged a bankruptcy attorney, H. Bruce Bronson of Bronson Law Offices, P.C.
7. I now realize that I never qualified for chapter 13 due to the extent of my secured debt.
8. I would now like the opportunity to liquidate my own assets as I own three properties, two of which I am willing and able to sell and one of which I intend to reside in as my home.
9. Accordingly, I desire to convert this case to Chapter 11 with the Court's approval.
10. My accounting firm, which has represented my family in the past, has pledged to work with me throughout my bankruptcy in order to provide operating reports, tax returns and profit and loss statements as may be required.
11. I apologize to the Court for not acting promptly to hire an attorney in the first instance; however, I have had a number of family members die in the past several years, which has

left me in an emotionally fragile state and I have been living with Lyme disease since 2018 which has caused me severe fatigue and debilitating back pain.

12. I do believe I have all the components now in order to propose a plan of reorganization, based upon the sale of some of my assets, and I believe I will be able to pay my creditors 100% of what they are owed.

Dated: New York, New York
May 9, 2020



Nicholas J. Sands